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Monday, October 20, 2025

VIA: U.S. Post

The Honorable Ellen L. Hollander
United States District Court
101 West Lombard Street
Baltimore, Maryland 21201

Re: Civil Action No. ELH-21-0309 - Request for Clarification
Related Maryland Case: C-02-CV-23-000601 (Sanctions Motion)

Dear Judge Hollander:

I respectfully write to request clarification from this Court regarding statements made by parties in your case within a related Maryland Circuit Court proceeding.

Attorneys acting on my family's behalf have filed motions under Maryland Rule 1-341 (Sanctions) in *Compass Marketing, Inc., v. Daniel White, et. al*, Case No. C-02-CV-23-000601 (Anne Arundel Circuit Court). Some sanctions have already been granted by that Court in our favor against Compass, Kagan Stern, and the Smithey Law Group. [Exhibit1]. Additional motions are pending. [Exhibit 2].

In response, Attorney Stern represented to the Circuit Court that a "*baseless motion for sanctions*" had been filed against him and his firm in this federal case, and further stated that "*the federal court did not waste its time to rule on it.*" [Exhibit 3]. Mr. Stern's characterization appears to suggest that this Court has declined to consider or otherwise acted on my request for sanctions.

Although I question the accuracy of Mr. Stern's representations, I recognize that communication may have occurred between counsel and the

Court to which I was not privy. Accordingly, I respectfully request clarification from this Court as to whether my motion for sanctions remains pending or has been closed by this Court, so that I may accurately inform the Anne Arundel Circuit Court during the upcoming hearing.

Please let me know if any additional documentation or information would assist the Court in addressing this request.

Respectfully submitted,



Michael R. White

CC: Copies have been sent to:

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